

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION

IN RE: § CASE NO. 14-70254  
§  
Soluciones Emprendedoras Del Norte §  
SOFOM ENR, L.L.C., §  
DEBTOR. § CHAPTER 11

**MOTION FOR AUTHORITY TO USE CASH COLLATERAL**

**This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.**

**Represented parties should act through their attorney.**

**TO THE HONORABLE U.S. BANKRUPTCY JUDGE:**

COMES NOW, Debtor, Soluciones Emprendedoras Del Norte SA DE CV SOFOM ENR, L.L.C. (“Debtor”), and files this Motion for Authority to Use Cash Collateral, and in support thereof, shows:

**Jurisdiction**

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§157 and 1334. This is a core proceeding pursuant to 28 U.S.C & 157.

Background Facts

2. On the 29th day of April, 20114, Debtor initiated this bankruptcy proceeding seeking protection under Chapter 11 of the Bankruptcy Code.

3. Pursuant to Section 1108, Debtor is authorized to operate their businesses as a debtors-in-possession under Section 1107.

4. Loan Quest Mortgage has a lien on the following properties that generate cash collateral: (i) Lot 15, Block 8, Regal Crest Unit Five Replat "A," An Addition to the City of El Paso, El Paso County, Texas; (ii) Lots 7 and 8, Block 16, The Willows Unit Five, and Addition to the City of El Paso, El Paso, County, Texas; (iii) Lot 1, Block 25, Tres Suenos Unit Five, an Addition to the City of El Paso, El Paso County, Texas; and (iv) Lot 30, Block 5, Spanish Pines Unit III Subdivision, an Addition to the City of El Paso, El Paso County, Texas.

Relief Requested

5. Pursuant to Sections 363, Bankruptcy Rule 4001(b)(1) and Local Bankruptcy Rule 4002(i), Debtor requests this Court to enter an order authorizing the use of cash collateral.

Arguments

6. Debtor contends that in order to have an effective reorganization, Debtor requires that it be authorized to use the Cash Collateral of Loan Quest Mortgage in the reorganization process of this bankruptcy proceeding and for the necessary expenses of preserving this estate. Attached hereto as **Exhibit "A"**, is a budget under which Debtor intends to operate its business.

7. Should Debtor be denied the use of cash collateral, Debtor's opportunity to have an effective reorganization will be impaired and will not have the ability to make an attempt to successfully reorganize.

WHEREFORE, PREMISES CONSIDERED, Debtor requests this Court to grant this Motion for Authority to Use Cash Collateral, and for any other and further relief, at law or in equity, to which Debtor may be justly entitled.

Respectfully submitted,

CAMPERO & ASSOCIATES, P.C.

By: /s/Adolfo Campero, Jr.  
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ATTORNEY FOR DEBTOR

**CERTIFICATE OF SERVICE**

I, Adolfo Campero, Jr., do hereby certify that on this 5th day of May, 2014, a true and correct copy of the foregoing motion was served by regular U.S. Mail, postage prepaid, facsimile, and/or by electronic means on the U.S. Trustee, Falcon International Bank, and to all other parties in interest.

/s/Adolfo Campero, Jr.  
Adolfo Campero, Jr.